



OS REGISTRY

6-1049X

Washington, D.C. 20530

SEP 8 1986

STAT

[Redacted]
Chairman
Personnel Security Committee

Re: Comments Concerning Proposed Personnel
Security Committee Charter

Dear [Redacted]

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After consulting with various organizations of the Department of Justice (DOJ), it is our opinion that this second draft of the Personnel Security Committee (PSC) Charter still contains unresolved issues regarding jurisdiction and authority. Moreover, the charter excludes Sensitive Compartmented Information and intelligence sources and methods from the PSC as general categories, while assuming jurisdiction over all other areas of security.


In addition, the charter assigns certain functions to the PSC which are overbroad and conflict with functions assigned by statute and law to existing executive branch agencies. For example, Section 2 parts b., c., d., and e. of the charter regarding "government-wide" personnel security standards, training and research are in conflict with Office of Personnel Management (OPM) responsibilities.

Similarly, The PSC charter independently appoints itself as the "follow-on action body" for the NSDD-84 Personnel Security Working Group and the CI/CM Task Force on polygraph policy where it has no authority to do so. Finally, the charter ignores the statutory role of OPM, Office of Management and Budget and DOJ for developing, coordinating and implementing personnel security related executive orders and presidential directives.

Based on these concerns, the DOJ believes that the PSC charter should be redrafted with a more appropriate view of the limited scope and authority of this group.

Thank you for the opportunity to comment on this matter. Should you have any questions, please call me on 633-2094.

Sincerely,


D. Gerry Rubino, Director
Security Staff
Justice Management Division